

UNITED STATES DISTRICT COURT

for the

Western District of Missouri

United States of America
v.
KENNETH HOWARD WORTHY
(DOB 12/06/1975)

Case No.
21-mj-2024DPR

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 4, 2020, to March 5, 2021, in the county of Howell in the
Western District of Missouri, the defendant(s) violated:

Code Section

18 U.S.C. Section 2251(a)

Offense Description

Beginning on an unknown date, but as early as July 4, 2020, and continuing through March 5, 2021, said dates being approximate, in Howell County, and elsewhere, in the Western District of Missouri, the defendant, KENNETH HOWARD WORTHY, employed, used, persuaded, induced, enticed, and coerced a minor, John Doe, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce, all in violation of Title 18, United States Code, Section 2251(a) and (e).

This criminal complaint is based on these facts:

Please see attached affidavit of HSI TFO Joseph Neuschwander

☒ Continued on the attached sheet.


Complainant's signature

Joseph Neuschwander, HSI TFO

Printed name and title

Sworn to before me over the telephone and signed by me pursuant to Fed.R.Crim.P. 4.1 and 4(d).

Date: 3/30/21


Judge's signature

City and state: Springfield, Missouri

David P. Rush, Chief United States Magistrate Judge, Western District of Missouri

Printed name and title